

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

KHIN SUH,

Plaintiff

v.

**TYSON FOODS, INC., TYSON
PREPARED FOODS, INC., TYSON
FARMS, INC., AND TYSON
*Defendants.***

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CIVIL ACTION NO. 4:19-cv-00409-O

PLAINTIFF'S PRETRIAL DISCLOSURES PURSUANT TO RULE 26(a)(3)

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff Khin Suh ("Suh") makes the following pretrial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(3), the Scheduling Order issued by the Court on June 24, 2019,¹ and the Order issued by the Court on June 2, 2020.² Plaintiff reserves the right to offer additional rebuttal witnesses and exhibits which cannot be anticipated at this time.

I. Witnesses

Plaintiff expects to present the following witnesses at the time of trial, other than solely for impeachment:

Khin Suh
2613 Clover Meadow Drive
Fort Worth, TX 76123
936-427-0520

Tlang Hawl
2613 Clover Meadow Drive
Fort Worth, TX 76123
936-427-0520

Thant Zin Oo
2613 Clover Meadow Drive

Fort Worth, TX 76123
936-332-3897

Khin Nan Cii
2613 Clover Meadow Drive
Fort Worth, TX 76123
682-301-0356

Ki Zong Leng
2613 Clover Meadow Drive
Fort Worth, TX 76123
817-253-9965

Tin Aye Nwe
7617 Rainbow Creek Drive
Fort Worth, TX 76123
817-333-9724

Safi Devothe
Address and phone unknown.
817-550-4777

Representative of Tyson Foods, Inc., Tyson Prepared Foods, Inc., and Tyson Farms, Inc.
c/o Mayer, LLP
750 N. St. Paul Street, Ste. 700
Dallas, TX 75201
214-379-6900

Naymarie Garay
8761 Lariat Circle
Fort Worth, Texas 76244
Phone number unknown

Joel Navarrete
4709 NE Loraine St.
Haltom City, TX 76117
(682) 465-6400

James Johnson
500 NW Charlyne Dr.
Burleson, Texas 76028
817-819-4304

Tim Gest
2645 Lakeside Dr.

Burleson, Texas 76028
Phone number unknown

Fidel Suarez
2612 Honeysuckle Ave
Fort Worth, TX 76111
682-597-0427

Jason English
English Engineering Inc.
543 William D Fitch Pkwy, Ste. 112
College Station, TX 77845
(979) 431-0702

Dr. Scott Farley
Comprehensive Spine Center of Dallas
1000 9th Avenue, Suite A
Fort Worth, Texas 76104
214-241-1427

Dr. Jason Marchetti
Physician's Life Care Planning
6505 W Park Blvd #155
Plano, TX 75093
(469) 458-6119

Thomas Roney
3313 W. Fifth Street
Fort Worth, TX 76107
(214) 665-9458

Plaintiff lists the following witnesses that she may call at the time of trial if the need arises:

Ulia Idin
2613 Clover Meadow Drive
Fort Worth, TX 76123
817-253-9965

Kl Buk Ring
2613 Clover Meadow Drive
Fort Worth, TX 76123
817-253-9965

Steven Hlamuan
7617 Rainbow Creek Drive

Fort Worth, TX 76123
817-870-6106

Sifa Nyiraguhirwa
Address and phone unknown.

Greg Irby
Kerry Foods
7401 Will Rogers Blvd.
Fort Worth, Texas 76140
(469) 754-2000

Alberto Romero
Kerry Foods
7401 Will Rogers Blvd.
Fort Worth, Texas 76140
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Armando Zavala
Kerry Foods
7401 Will Rogers Blvd.
Fort Worth, Texas 76140
(469) 754-2000

Miguel Sanchez
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7401 Will Rogers Blvd.
Fort Worth, Texas 76140
(469) 754-2000

Louis Rabago
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7401 Will Rogers Blvd.
Fort Worth, Texas 76140
(469) 754-2000

Jaime Gonzalez
Kerry Foods
7401 Will Rogers Blvd.
Fort Worth, Texas 76140
(469) 754-2000

Victor (or Ramon) Camacho
Kerry Foods
7401 Will Rogers Blvd.

Fort Worth, Texas 76140
(469) 754-2000

Sylvestre Vergara
Kerry Foods
7401 Will Rogers Blvd.
Fort Worth, Texas 76140
(469) 754-2000

Estella Garza
7401 Will Rogers Blvd.
Fort Worth, TX 76140
(469) 754-2000

Donnie White
Kerry Foods
7401 Will Rogers Blvd.
Fort Worth, Texas 76140
(469) 754-2000

Santos Puga Carrillo
3109 Autumn Run Dr.
Forrest Hill, TX 76140
Phone number unknown

Reydecel Davila
3157 Oscar Ave.
Fort Worth, TX 76106
Phone number unknown

Ilangi Kalonga
4400 Abbey Apt 6104
Fort Worth, TX 76119
817-987-8662

Sergio Lopez
2819 Gipson
Fort Worth, TX 76111
Phone number unknown

Martinez Hernandez
Address and phone unknown.

David Shabani
2225 Jacocks Lane, Apt. 2914

Fort Worth, TX 76115
469-510-6298

Jesus Sierra
Address and phone unknown.

Adrian Ventura
2729 Daisy Lane
Fort Worth, TX 76111
817-706-4546

Ashwe Yone
1470 Carol Oaks Ln 2601
Fort Worth, TX 76112
Phone number unknown

Ms. Sonja Duncan, RN
Cardiovascular Home Care
7261 Hawkins View Drive
Fort Worth, TX 76132
817-847-8888

Jake Mitchell, PT
Cardiovascular Home Care
7261 Hawkins View Drive
Fort Worth, TX 76132
817-847-8888

Dr. George Farley
Comprehensive Spine Center of Dallas
1000 9th Avenue, Suite A
Fort Worth, Texas 76104
214-241-1427

Dr. Arash Bidgoli
Comprehensive Spine Center of Dallas
1000 9th Avenue, Suite A
Fort Worth, Texas 76104
214-241-1427

Nik Volkov, Ph.D.
3313 W. Fifth Street
Fort Worth, TX 76107
(214) 665-9458

Dr. Mark Wylie
Fort Worth Orthopedics, a clinic of Texas Health Physicians Group
6301 Harris Parkway, Ste. 200
Fort Worth, TX 76132
817-433-3450

Troy Duley, P.A.-C.
Fort Worth Orthopedics, a clinic of Texas Health Physicians Group
6301 Harris Parkway, Ste. 200
Fort Worth, TX 76132
817-433-3450

Mary Agnus Jonson, NP
JPS Health Network
1500 S. Main Street
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817-921-3431

Dr. Douglas Dickson
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1500 S. Main Street
Fort Worth, TX 76104
817-921-3431

Dr. Sara Haynes
JPS Health Network
1500 S. Main Street
Fort Worth, TX 76104
817-921-3431

Dr. Brooke Schutte
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1500 S. Main Street
Fort Worth, TX 76104
817-921-3431

Dr. Brian Nwannunu
JPS Health Network
1500 S. Main Street
Fort Worth, TX 76104
817-921-3431

Dr. Travis Rhodes
JPS Health Network
1500 S. Main Street

Fort Worth, TX 76104
817-921-3431

Dr. Amir R. Hegazi, M.D.
JPS Health Network
1500 S. Main Street
Fort Worth, TX 76104
817-921-3431

Dr. Rama K. Kancharla, M.D.
JPS Health Network
1500 S. Main Street
Fort Worth, TX 76104
817-921-3431

Dr. Ambika K. Nair, M.D.
JPS Health Network
1500 S. Main Street
Fort Worth, TX 76104
817-921-3431

Shuang Chen, A.P.R.N., F.N.P.
JPS Health Network
1500 S. Main Street
Fort Worth, TX 76104
817-921-3431

Jessica Ferguson, L.P.C.
JPS Health Network
1500 S. Main Street
Fort Worth, TX 76104
817-921-3431

Dr. Addie Boone
JPS Health Network
1500 S. Main Street
Fort Worth, TX 76104
817-921-3431

Samantha R. Thomas, PA-C
JPS Health Network
1500 S. Main Street
Fort Worth, TX 76104
817-921-3431

Dr. Stephen L. Brotherton, M.D.
Texas Health Care, PLLC (a/k/a Previa Medical Group)
1651 West Rosedale, Ste. 200 and 205
Fort Worth, TX 76104
817-332-9966
817-335-4316

Drew Thompson, P.A.
Texas Health Care, PLLC (a/k/a Previa Medical Group)
1651 West Rosedale, Ste. 200 and 205
Fort Worth, TX 76104
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817-335-4316

Dr. James Brezina, Jr., M.D.
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1651 West Rosedale, Ste. 200 and 205
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817-335-4316

Dr. Christopher Pratt, D.O.
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1651 West Rosedale, Ste. 200 and 205
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817-335-4316

Dr. Ramu Rangineni, M.D.
Texas Health Care, PLLC (a/k/a Previa Medical Group)
1651 West Rosedale, Ste. 200 and 205
Fort Worth, TX 76104
817-332-9966
817-335-4316

Cameron Carmody, M.D.

Eduardo Elizondo, MD, CLCP

Leigh Anne Levy

James W. Stanley

All records custodians for Khin Suh's medical records and medical billing records, including but not limited to the custodians of records for:

- Medical- Amazing Grace Home Health Agency
- Medical- Baylor Scott & White All Saints FW
- Medical- Baylor Surgicare
- Medical- Cardiovascular Home Care
- Medical- Comprehensive Spine Center
- Medical- Elite Medical Laboratory Solutions
- Medical- John Peter Smith Health Network
- Medical- MedStar Ambulance
- Medical- Midtown Medical Imaging
- Medical- MRI Centers of Texas
- Medical- Propath
- Medical- Prostheticare FW, LP
- Medical- Texas Health Harris Methodist SW FW care of Texas Health Resources
- Medical- Texas Health Physician Group- FW Ortho
- Medical- Texas Healthcare PLLC
- Medical- Vista Physical Therapy
- Billing- Amazing Grace Home Health Agency
- Billing- Baylor Scott & White All Saints FW
- Billing- Baylor Surgicare
- Billing- Cardiovascular Home Health
- Billing- Century Integrated Partners
- Billing - Comprehensive Spine Center
- Billing- Elite Medical Laboratory Solutions
- Billing- John Peter Smith Health Network
- Billing- MedStar Ambulance
- Billing- Midtown Medical Imaging
- Billing- MRI Centers of Texas
- Billing- Propath
- Billing- Prostheticare Fort Worth, LP
- Billing- Radiology Associates of North Texas
- Billing- Tarrant Pathology Associates
- Billing- Texas Health Resources (TX Health Southwest FW)
- Billing- Texas Health Physician Group- FW Ortho
- Billing- Texas Healthcare PLLC
- Billing- Uptown Radiology Associates
- Billing- US Anesthesia
- Billing- Vista Physical Therapy

Sharon Olson
Custodian of records for Kerry Foods
3400 Millington Road
Beloit, WI 53511
608-363-1200

Terra Brimberry
Custodian of records for Intertek Alchemy

Any individual who has been or will be named by any party in response to any Interrogatory;

Any individual whose name appears on any document which has been or will be produced by any party in any response to Request for Production;

Any individual whose name is reflected in any document which has been or will be submitted to a court by affidavit;

Any individual whose name is reflected in any document which has been or will be subpoenaed by any party;

Any individual whose name appears in the transcript of any deposition taken in this matter;

Any individual whose name is reflected in any document which has been or will be attached to the transcript of any deposition;

Any employees, agents, or representatives of any of the individuals or entities identified above as witnesses; and

The custodians of records for any the individuals and/or entities, where applicable, identified above as witnesses.

Plaintiff also reserves the right to read portions of or complete depositions of other persons taken in other litigation in response to any deposition designation proffered by Defendants.

Plaintiff further reserves the right to call any witness named by Defendants, and reserve the right to call any witness necessary for rebuttal or impeachment purposes.

Plaintiff further reserves the right to amend this list as necessary to include individuals or entities identified in further discovery of this matter, as rebuttal witnesses, or in response to pretrial or trial rulings by the Court.

II. Depositions

Plaintiff designates the following witnesses that she may present by deposition at the time of trial, other than solely for impeachment:

Timothy Gest

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James Johnson

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Naymarie Garay

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Plaintiff specifically reserves the right to offer other portions of the above depositions at trial in response to testimony or other evidence by Defendants or to clarify or rebut testimony inconsistent with that contained in the above deposition transcript. Plaintiff further reserves the right to present as evidence all portions of any witness' deposition testimony designated by Defendants.

Dr. Jason Marchetti
Thomas Roney

MRI Centers of Texas (deposition transcript received today)
Ki Zong Leng (deposed but transcript not yet received)
Joel Navarrete (deposed but transcript not yet received)
Jason English (deposed but transcript not yet received)
Dr. Scott Farley (deposed but transcript not yet received)
James Stanley (deposed but transcript not yet received)
US Anesthesia, P.A. / US Anesthesia Partners of Texas (deposed but transcript not yet received)
Texas Health Physician's Group – Fort Worth Orthopedics (deposed but transcript not yet received)
Cameron Carmody (not yet deposed)

Baylor Scott & White All Saints Medical Center at Fort Worth (not yet deposited)
 John Peter Smith Health Network (not yet deposited)
 Metropolitan Area EMS Authority d/b/a Medstar Mobile Healthcare (not yet deposited)
 Texas Health Resources (not yet deposited)
 Fidel Suarez (not yet deposited)
 Estella Garza (not yet deposited)
 Greg Irby (not yet deposited)

III. Exhibits

Plaintiff designates the following exhibits that she may offer into evidence at the time of trial (not necessarily in order of introduction), other than solely for impeachment:

<u>Exhibit Number</u>	<u>Description</u>
1	FW Kettle- General Labor task/requirement; TYS 501
2	Personnel Action Form - Hire - 9/13/11; TYS0046
3	Post offer health assessment- 9 13 11; TYS0075-78
4	Email to Estella Garza that transfer request for Khin Suh completed; transfer date 1/9/17; TYS0072
5	On-the-job Job Safety Manual (Plant Safety Manual - 2014) (unsigned); TYS 519-546
6	Department Listing of Payroll Results 4/2/17 - 4/22/17; TYS 0600-0602
7	Alchemy Manager User Transcript - Learner: Khin Suh; training 9/8/17; TYS 0556
8	Khin Suh request for vacation from 9/11/17-9/15/17 dated 9/8/17; TYS 0580
9	Khin Suh request for vacation from 9/18/17-9/22/17 dated 9/8/17; TYS 0582
10	Personnel Action Form - Transfer - 10/29/17; TYS0043
11	Proof of Employment THHSC; TYS0070
12	Exhibit 1 from Depo of Joel Navarette - Blueprint of Tyson facility
13	Job Safety Analysis for Kettles - Debox Slury Lines 1&2; TYS 0549-0555
14	Employee's Initial Report of Injury/Illness – 4/12/17; TYS 0074
15	Employer's Report of Accident/Illness – 4/12/17; TYS 0073
16	Email from James Johnson to Naymarie Garay dated 4/13/17 at 1:21 am; TYS 509
17	Tyson 8 week follow-up form
18	Kettle Relocation - Renovation of Sauce Prep Room, May - June 2017; TYS 0547-0548
19	9/22/17 Texas Health Care (Stephen Brotherton); DWQ THC2 – 00061, 00075-00076, 00001-00007
20	9/22/17 Texas Health Care - light duty work restrictions dated 9/22/17; DWQ THC2 – 00029
21	9/22/17 Texas Health Care – referral to physical therapy dated 9/22/17; DWQ THC2 – 00054

22	X-ray image of pelvis/lumbar spine from Texas Health Care (Privia) dated 9/22/17
23	Tyson Job Placement Physical Recommendation-Temp Work Restriction, dated 9-25-17, signed by doctor; TYS 0079
24	10/2/17 – 10/13/17 Vista Physical Therapy; DWQ 00001-00033
25	Email from Estella Garza to James Johnson, Armando Zavala, Jr., cc to Miguel Sanchez, dated 10/6/17, and forwarded to Naymarie Garay, on same day, that Khin Suh has temporary work restrictions in place until 11/2/17; TYS 0510
26	10/20/17 Texas Health Care (Drew Thompson, PA); DWQ THC2 – 00008-00014
27	Texas Health Care - light duty work restrictions dated 10/20/17; TYS 0080
28	10/22/17 Midtown Medical Imaging; DWQ 00001-00006
29	10/31/17 Texas Health Care (Dr. Brezina); DWQ THC2 – 00016-00023
30	Light Duty Status Note from Dr. Brezina of Texas Health Care dated 10/31/17; TYS 0081
31	MRI images of lumbar spine from Midtown Medical Imaging dated 10/22/17
32	11/22/17 Baylor Surgicare FW (Dr. Christopher Pratt); DWQ 00001, 00005, 00011, 00017, 00020, 00023-00024, 00029
33	Baylor Surgicare -Note to Employer 11 22 17; TYS 0082
34	11/24/17 Baylor Surgicare FW; DWQ 00021
35	11/30/17 MedStar; DWQ 00001-00004
36	11/30/17 Baylor Scott & White; DWQ 00001-00009, 00013-00017, 00028, 00038
37	CT of abdomen and pelvis from Baylor Scott & White dated 11/30/17
38	12/6/17 Texas Health Care (Dr. Christopher Pratt); DWQ THC2 – 00055-00059; DWQ THC1-00010-00011, 00013-00016
39	12/6/17 Elite Medical Laboratory; DWQ 00006-00007
40	12/7/17 Texas Health Care (Dr. Christopher Pratt); DWQ THC1 – 00008
41	12/12/17 Fort Worth Orthopedics (Dr. Mark Wylie); DWQ 00002-00016
42	X-ray image of lumbar spine from Fort Worth Orthopedics dated 12/12/17
43	Surgery Book from Dr. Mark Wylie, Fort Worth Orthopedics
44	12/12/17 – 12/15/17 Harris SW; DWQ 00001-00050, 00062-00069, 00094-00118, 00127-00221
45	X-ray images of lumbar spine from THR Harris Southwest dated 12/13/17
46	12/20/17 Fort Worth Orthopedics; DWQ 00152
47	12/22/17 – 1/4/18 CardioVascular Home Care; DWQ 00002-00004, 00029-00062, 00065-00102
48	1/3/18 Fort Worth Orthopedics (Troy Duley, PA-C); DWQ 00021-00025
49	1/29/18 Fort Worth Orthopedics; DWQ 00154
50	2/15/18 Fort Worth Orthopedics (Troy Duley, PA-C); DWQ 00038-00042
51	4/19/18 Fort Worth Orthopedics (Troy Duley, PA-C); DWQ 00046-00050
52	X-ray images of lumbar spine from Fort Worth Orthopedics dated 4/19/18
53	9/14/18 JPS-Urgent Clinic (Mary Agnus Jonson, NP); DWQ 00001-00008, 00025

54	X-ray image of lumbar spine from JPS dated 9/14/18
55	11/2/18 JPS (Dr. Douglas Dickson - Orthopedic Spine Surgery); DWQ 00046-00051
56	1/21/19 – 3/14/19 JPS (Physical Therapy); DWQ 00095-00098, 00110-00112, 00123-00126, 00137-00139, 00150-00152, 00163-00165, 00176-00177, 00188-190
57	3/19/19 JPS (Family Medicine) (Dr. Brooke Schutte, Resident to Dr. William Pate); DWQ 00200-00205
58	5/6/19 JPS (Neurosurgery) (Dr. Oliver Kesterson's resident, Dr. Brian Nwannunu); DWQ 00236-00241, 00255-00256
59	7/18/19 JPS (Leuda Pain Management Clinic) (Dr. Travis Rhodes); DWQ 00410-00417
60	7/26/19 JPS (Leuda Pain Management Clinic) (Dr. Travis Rhodes); DWQ 00455-00462
61	10/4/19 JPS (Leuda Pain Management Clinic) (Dr. Amr R. Hegazi, M.D.); 2/6/20 Aff'd – 51-52, 54-60, 72
62	11/5/19 JPS (Leuda Pain Management Clinic) (Dr. Anupa Seth, M.D.); 2/6/20 Aff'd – 93-103, 120, 122, 127, 158-160
63	11/5/19 MedStar; PDF pp. 2-5
64	11/5/19 JPS; 2/6/20 Aff'd – 171-179
65	11/6/19 – 11/8/19 JPS; 2/6/20 Aff'd – 237-275
66	11/12/19 JPS Family Care (Shuang Chen, A.P.R.N., F.N.P.); 2/6/20 Aff'd – 682-688
67	11/18/19 - 12/18/19 Amazing Grace HHA; PDF pp. 1-52
68	12/2/19 JPS (Connect Clinic) (Sireesha Kolachalama, M.D.); 2/6/20 Aff'd – 715-722
69	12/3/19 JPS- Leuda Pain Management (Maureen E. Joyner, A.P.R.N., N.P.); 2/6/20 Aff'd – 763-767, 787-788
70	12/3/19 MedStar; PDF pp. 9-13
71	12/3/19 JPS; 2/6/20 Aff'd – 797-806
72	1/9/20 JPS; 2/6/20 Aff'd – 881-894, 991
73	1/10/20 JPS (Behavioral Health; Jessica Ferguson, L.P.C.); 2/6/20 Aff'd – 1007-1017, 1029, 1031-1033
74	1/16/20 JPS (Family Medicine) (Dr. Addie Boone); 2/6/20 Aff'd – 1044-1054, 1073
75	1/27/20 JPS (Behavioral Health) (Samantha R. Thomas, PA-C); 2/6/20 Aff'd – 1095-1117
76	2/4/20 - 4/2/20 JPS (Physical Therapy); 7/7/20 Aff'd – 1-4, 21, 76-78, 96, 120-122, 138, 195-197, 214, 279-281, 298-299, 309-311, 328, 338-340, 357
77	2/6/20 MRI Centers of TX; PDF p. 1
78	2/11/20 JPS (Neurology); 7/7/20 Aff'd – 31-43
79	2/13/20 JPS; 7/7/20 Aff'd – 106-111
80	2/19/20 Comprehensive Spine Center (Dr. Scott Farley)
81	2/21/20 JPS; 7/7/20 Aff'd – 148-155, 157-160
82	2/27/20 MRI Centers of TX; PDF p. 7-10
83	2/28/20 Comprehensive Spine Center (Dr. Scott Farley)

84	3/3/20 Comprehensive Spine Center
85	3/4/20 Comprehensive Spine Center (Dr. Scott Farley)
86	3/6/20 JPS (Behavioral Health); 7/7/20 Aff'd – 224-231, 236, 248,
87	Medical Record of Comprehensive Spine Center dated 3-6-20
88	Medical Record of Comprehensive Spine Center dated 3-12-20
89	Medical Record of Comprehensive Spine Center dated 3-13-20
90	4/27/20 JPS (Behavioral Health); 7/7/20 Aff'd – 367-381
91	6/4/20 JPS; 7/7/20 Aff'd – 404-411, 418
92	6/17/20 JPS; 7/7/20 Aff'd – 429-430, 432-437
93	Medical Record from Comprehensive Spine Center dated 6/2/20
94	Notice of Surgical Recommendations from Comprehensive Spine Center dated 3/5/2020
95	Itemized cost for Dorsal Column Stimulator Trial from Comprehensive Spine Center dated 3/5/20
96	Itemized cost for Dorsal Column Stimulator Permanent Implant from Comprehensive Spine Center dated 3/5/20
97	X-ray image of lumbar spine from MRI Centers of Texas dated 2/6/20
98	MRI image of lumbar spine from MRI Centers of Texas dated 2/27/20
99	CT image of lumbar spine from MRI Centers of Texas dated 2/27/20
100	Medical Records from JPS from 6/17/20 to the present
101	DWQ- Billing- Texas Healthcare PLLC (w/ DWQ Q & A)
102	DWQ- Billing- Vista PT (w/ DWQ Q & A)
103	DWQ- Billing- Midtown Medical Imaging (w/ DWQ Q & A)
104	DWQ- Billing- Baylor Surgicare (w/ DWQ Q & A)
105	DWQ- Billing- US Anesthesia (w/ DWQ Q & A)
106	DWQ- Billing- MedStar Ambulance (w/ DWQ Q & A)
107	DWQ- Billing- Baylor Scott & White All Saints FW (w/ DWQ Q & A)
108	DWQ- Billing- Century Integrated Partners (w/ DWQ Q & A)
109	DWQ- Billing- Radiology Associates of North Texas (w/ DWQ Q & A)
110	DWQ- Billing- Tarrant Pathology Associates (w/ DWQ Q & A)
111	DWQ- Billing- Elite Medical Laboratory Solutions (w/ DWQ Q & A)
112	DWQ- Billing- Texas Health Physician Group- FW Ortho (w/ DWQ Q & A)
113	DWQ- Billing- Propath (w/ DWQ Q & A)
114	Billing Records with Affidavit from Texas Health Resources (TX Health Southwest FW)
115	Billing Records with Affidavit from Prostheticare Fort Worth, LP
116	DWQ- Billing- Cardiovascular Home Health (w/ DWQ Q & A)
117	Billing Records from Amazing Grace Home Health Agency (no affidavit)
118	Billing Records with Affidavit (dated 5/26/20) from JPS (through 4/2/20)
119	Final Demand Letters from JPS dated 1/26/20

120	Billing Records with Affidavit (5/13/20) from Medstar (11/5/19 & 12/3/19 DOS)
121	Billing Records with Affidavit from MRI Centers of Texas
122	Billing Records from Uptown Radiology Associates (no affidavit)
123	Billing Records with Affidavit from Comprehensive Spine Center
124	Statement of Earnings and Deductions, payroll date 4/20/17; TYS 0462
125	W-2 from Tyson Farms, Inc. - 2014; TYS 0138
126	W-2 from Tyson Farms, Inc. - 2015; TYS 0139
127	W-2 from Tyson Farms, Inc. - 2016; TYS 0140
128	W-2 from Tyson Prepared Foods, Inc. - 2017; TYS 0141
129	2016 U.S. Individual Income Tax Return Form 1040
130	2017 U.S. Individual Income Tax Return Form 1040
131	2018 U.S. Individual Income Tax Return Form 1040
132	2019 U.S. Individual Income Tax Return Form 1040
133	Proof of Employment for TX HHSC signed by Tyson (Estella Garza) on 12/11/17
134	Retirement Savings Plan of Tyson Foods, Inc. account statement for 10/1/17 - 12/31/17
135	Distribution Statement Form 1099-R for Tyson Foods, Inc. Retirement Savings Plan, Acct. No. 1, for 2018
136	Distribution Statement Form 1099-R for Tyson Foods, Inc. Retirement Savings Plan, Acct. No. 2, for 2018
137	Jason English - CV & Publications
138	Report from English Engineering dated 3/13/20
139	Brauer, Roger L., Safety and Health for Engineers, Second Edition, 2006, pp. 139-140.
140	National Fire Protection Association, Life Safety Code Handbook, NFPA 101, 11th Edition, 2009, pp. 132-133.
141	National Safety Council, Slips, Trips and Falls on Floors, Data Sheet 495, Rev. November 2009, pp. 1-9.
142	OSHA 29 CFR 1910.22 - Walking/Working Surfaces: General Requirements
143	OSHA 29 CFR 1910.176 - Materials Handling and Storage: Handling Materials - general
144	ASTM International, F 1637-10 - Standard Practice for Safe Walking Surfaces, 2010.
145	Scott Farley - CV
146	Comprehensive Spine Center Website - Scott Farley Biography
147	Jason Marchetti - Biography
148	Jason Marchetti - CV
149	Medical Questionnaire - Marchetti Depo Ex. 5
150	Life Care Plan from PLCP dated 3/3/20
151	Amended Life Care Plan from Physician's Life Care Planning dated 7/9/20
152	Guides to the Evaluation of Permanent Impairment
153	Physician's Guide to Life Care Planning - Probable Duration of Care

154	Physician's Guide to Life Care Planning - Life Expectancy
155	Physician's Guide to Life Care Planning - Tenet, Methods, and Best Practices
156	Thomas Roney - CV
157	Supplemental Assessment of Economic Loss from Thomas Roney dated 7/10/20
158	Supplemental Assessment of the Present Value of the Life Care Plan of Khin Suh from Thomas Roney dated 8/4/20
159	9/14/20 Update to Personal Injury Economic Damages Report from Thomas Roney
160	FDRsafety invoice #15626 dated 6/1/20
161	FDRsafety invoice #15760 dated 9/8/20
162	MedSys Rehabilitation - invoice dated 6/20/20
163	MedSys Rehabilitation - depo invoice dated 8/24/20
164	Exhibit 2 from Depo of Joel Navarette - Photo of Vmag carts
165	Exhibit 3 from Depo of Joel Navarette - Photo of Vmag cart - bottom view
166	Exhibit 4 from Depo of Joel Navarette - Photo of Vmag carts - with and without handles
167	James Johnson Depo Exhibit 1 - Hand Drawing
168	Vmeg Cart Photo 1
169	Vmeg Cart Photo 2
170	Vmeg Cart Photo 3
171	Vmeg Cart Photo 4
172	SANI-LAV Stainless Steel V-Edge Dump Buggy, 400 lb. Load Capacity - 4ZDW3_400 - Grainger
173	SANI-LAV V-Edge Dump Buggies
174	V-Edge Dump Buggies – Models 600 and 400 with specifications
175	Photo of Khin Suh's scar
176	Day in the Life of Khin Suh video
177	Medical diagram 1
178	Medical diagram 2
179	Medical diagram 3
180	Summary of past medical xxpenses
181	Summary of Life Care Plan
182	Summary of loss of earnings in the past
183	Summary of loss of earnings in the Future
184	Summary of loss of capacity to perform household services in the past
185	Summary of loss of capacity to perform household services in the future
186	Summary of damages elements from court's charge
187	Blow-up of any of Plaintiff's or Defendants' exhibits, summaries, or demonstrative aids

MAY USE IF NECESSARY

<u>Exhibit Number</u>	<u>Description</u>
188	DWQ- Medical- Texas Healthcare PLLC (w/ DWQ Q & A)
189	DWQ- Medical- Texas Healthcare PLLC 2 (w/ DWQ Q & A)
190	DWQ- Medical- Vista PT (w/ DWQ Q & A)
191	DWQ- Medical- Midtown Medical Imaging (w/ DWQ Q & A)
192	DWQ- Medical- Baylor Surgicare (w/ DWQ Q & A)
193	DWQ- Medical- MedStar Ambulance (w/ DWQ Q & A)
194	DWQ- Medical- Baylor Scott & White All Saints FW (w/ DWQ Q & A)
195	DWQ- Medical- Elite Medical Laboratory Solutions (w/ DWQ Q & A)
196	DWQ- Medical- Texas Health Physician Group- FW Ortho (w/ DWQ Q & A)
197	DWQ- Medical- Propath (w/ DWQ Q & A)
198	DWQ- Medical- Texas Health Harris Methodist SW FW (w/ DWQ Q & A)
199	DWQ- Medical- Prostheticare FW, LP (w/ DWQ Q & A)
200	DWQ- Medical- Cardiovascular Home Care (w/ DWQ Q & A)
201	Medical Records from Amazing Grace Home Health Agency (no affidavit)
202	DWQ- Medical- JPS Health Network from 9/14/18 - 8/26/19 (w/ DWQ Q & A)
203	Medical Records, with Affidavit, from JPS from 8/26/19 - 1/27/20
204	Medical Records, with Affidavit, from JPS from 2/4/20 - 6/17/20
205	Medical Records with Affidavit from Comprehensive Spine Center
206	Medical Records with Affidavit from Comprehensive Spine Center
207	Medical Records from MRI Centers of Texas (no affidavit)
208	Medical Records with Affidavit (5/13/20) from MedStar
209	X-ray images of pelvis/lumbar spine from Texas Health Care (Privia) dated 9/22/17
210	MRI images of lumbar spine from Midtown Medical Imaging dated 10/22/17
211	CT of abdomen and pelvis from Baylor Scott & White dated 11/30/17
212	X-ray images of lumbar spine from Fort Worth Orthopedics dated 12/12/17
213	X-ray images of lumbar spine from THR Harris Southwest dated 12/13/17
214	Medical Records Affidavit from THR Harris Southwest for 12/13/17 x-ray imaging
215	X-ray images of lumbar spine from Fort Worth Orthopedics dated 1/3/18
216	X-ray images of lumbar spine from Fort Worth Orthopedics dated 2/15/18
217	X-ray images of lumbar spine from Fort Worth Orthopedics dated 4/19/18
218	X-ray images of lumbar spine from JPS dated 9/14/18
219	X-ray images of lumbar spine from JPS dated 11/2/18
220	X-ray images of lumbar spine from JPS dated 5/6/19
221	Medical Records Affidavit from JPS for radiology reports and imaging CD
222	CT images of Head from JPS dated 11/6/19
223	MRI images of Lumbar Spine from JPS dated 11/8/19
224	X-ray images of lumbar spine from MRI Centers of Texas dated 2/6/20

225	MRI images of lumbar spine from MRI Centers of Texas dated 2/27/20
226	CT images of lumbar spine from MRI Centers of Texas dated 2/27/20
227	Social Security Earnings Record for Khin Suh - certified copy
228	Excel Spreadsheet - Present Value Analysis of Amended Life Care Plan
229	Excel Spreadsheet - Personal Injury Economic Damages Report - Revised Report
230	Checklist completed by Smith & Smith for Thomas Roney
231	Expectancy Data - Employer Paid Benefits
232	Expectancy Data - Full Time Earnings in the US
233	Personal Consumption by Family Type and Household Income
234	CBO - distribution of household income and federal taxes 2010
235	Consumer Price Index Detailed Report, Table 3A. Historical Consumer Price Index for All Urban Consumers (CPI-U) (U.S. city average, by commodity and service group, and detailed expenditure categories), January 2000 through January 2019.
236	Office of the Actuary, Centers for Medicare & Medicaid Services (CMS) National Health Price Increase Projections – 2016-2025, Annual Price Growth.
237	U.S. Bureau of Labor Statistics Consumer Price Index, Measuring Price Change for Medical Care in the CPI
238	CBO's Year-by-Year Forecast and Projections, An Update to The Budget and Economic Outlook: Years 2020 to 2030, July 2020, The Congress of the United States, Congressional Budget Office. http://www.cbo.gov/
239	The United States Old Age Survivors Insurance & Federal Disability Insurance (OASDI) Trust Funds' 2020 Annual Report of the Board of Trustees, Table V.B.1.- Principal Economic Assumptions.
240	Municipal Bond AAA Yield Curve: 1 - 30 Year Maturities, Municipal Bonds Yields: Triple-A Rated, Tax-Exempt Insured Bonds, Latest update July 31, 2020. Report produced by Municipal Market Analytics (MMA).
241	Expectancy Data Healthy Life Expectancy: 2017 Tables. Shawnee Mission, Kansas 2019. Table 3. United States, 2015.
242	"The Markov Process Model of Labor Force Activity: Extended Tables of Central Tendency, Shape, Percentile Points, and Bootstrap Standard Errors", Gary Skoog, James Ciecka, and Kurt Krueger. Journal of Forensic Economics, Vol. 28, No. 1, 2019, (published in 2019). Table 23.
243	Municipal Bond AAA Yield Curve: 1 - 30 Year Maturities, Municipal Bonds Yields: Triple-A Rated, Tax-Exempt Insured Bonds, Latest update July 1, 2020. Report produced by Municipal Market Analysts (MMA).
244	The Distribution of Household Income and Federal Taxes, 2010, December 2013, Source: Congressional Budget Office.
245	Social Security and Medicare Taxes Update 2018, Social Security Administration.
246	The 2019 Annual Report of the Board of Trustees of the Federal Old Age and Survivors Insurance and Federal Disability Insurance Trust Funds. Table V.B1.- Principal Economic Assumptions.

247	CBO's Year-by-Year Forecast and Projections, An Update to The Budget and Economic Outlook: Years 2019 to 2029, August 2019, The Congress of the United States, Congressional Budget Office.
248	2019 Federal Income Tax Brackets: https://taxfoundation.org/2019-tax-brackets
249	U.S. Bureau of Labor Statistics Consumer Price Index, All Urban Consumers (CPIU) U.S. city average. Series ID: CUUR0000SA0,CUUS0000SA0. http://data.bls.gov/
250	Expectancy Data, "Dollar Value of a Day", 2017 Dollar Valuation, Shawnee Mission, Kansas, 2018, Tables 48, 49, 105, and 221.
251	Online Intake Questionnaire - Marchetti Depo Ex. 6
252	Role of the Psychiatrist in Life Care Planning
253	National Vital Statistics Reports
254	Definition of Usual, Customary, and Reasonable
255	Email from Yan Wynn to Estella Garza dated 1/4/17; TYS 505
256	Statement of Earnings and Deductions, payroll dates 8/17/17 - 12/7/17; TYS 0479-0495
257	Personal Information of Fidel Suarez; TYS 0713

Plaintiff further specifically reserves the right to:

1. Offer demonstrative aides based on evidence presented at trial.
2. Offer other exhibits by way of impeachment or rebuttal, should it be necessary.
3. Make charts, graphs or other summary of data which may aid the jury and be introduced as evidence at the time of trial.
4. Present as evidence all exhibits designated or offered by Defendants.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that on this 16th day of September 2020, a copy of the foregoing instrument was served upon the attorneys of record to the above cause, as follows:

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